

### REMARKS

Claims 1-35 are pending in this application.

The Office Action indicates that claims 15-20 and 23-34 are objected to, but would be allowable if rewritten in independent form. However, for the reasons set forth below, it is submitted that all claims are in condition for allowance.

The Office Action rejects claims 1-14, 21-22 and 35 under 35 USC 102 over Schiff (US Pat. Pub. 20030074328). This rejection is respectfully traversed.

Claim 1 recites a system for enabling targeted content delivery to a mobile device, the mobile device having a device address having associated therewith at least one unique identifier. The system includes a message application server, and a trigger system in communication with said message application server. The trigger system includes a trigger client component configured to generate a trigger signal comprising a trigger action, user content request data and said at least one unique identifier; and a trigger server component in communication with said trigger client component. The trigger server component trigger is configured to: receive said trigger signal, and send to said message application server said trigger signal for processing by said message application server. The message application server is configured to: receive from said trigger system said trigger signal, and in response thereto: derive said mobile device address from said at least one unique identifier, generate content based on said user request data, and send said generated content to said device address of said mobile device.

It is submitted that Schiff does not disclose many elements of claim 1. First, Schiff does not disclose a system for enabling targeted content delivery to a mobile device as required by claim 1. Schiff discloses a system for conducting a financial transaction using communication device 14. Apparently the Office Action considers the communication device 14 to be equivalent to the claimed mobile device. However, the system of Schiff is not for sending targeted content to the communication device 14, but instead allows the user to conduct a

financial transaction using the communication device 14, such as an ATM withdrawal with ATM device 12.

Further, the Office Action asserts that database 28 is equivalent to the claimed message application server. Claim 1 requires that the message application server receive from said trigger system said trigger signal, and in response thereto: derive said mobile device address from said at least one unique identifier, generate content based on said user request data, and send said generated content to said device address of said mobile device. However, it is respectfully asserted that database 28 does not derive the address of communication device 14 from a signal received from the financial transaction system 16 (asserted to be equivalent to the claimed trigger system), or send generated content to said device address of said communication device 14, as would be required to anticipate these elements of claim 1.

In contrast, Schiff discloses that the financial transaction system 16 can access the database 28 which stores information associated with the user. See 0036 and 0037. As explained in 0039, a user contacts the financial transaction device 12 via communication device 14 using ATN 42 associated with transaction device 12. Financial transaction system 16 verifies the identity of the user, and as explained in 0040, transmits financial information associated with the user to transaction device 12, allowing the user to conduct the transaction such as withdrawing cash from the ATM 12. The database 28 does not derive the address of communication device 14 from a signal received from the financial transaction system 16 (asserted to be equivalent to the claimed trigger system), or send generated content to said device address of said communication device 14, as would be required to anticipate these elements of claim 1.


Accordingly, claim 1, and all claims dependent therefrom, are not anticipated by Schiff. Withdrawal of the rejection is requested.

For the above reasons, it is submitted that the application is in condition for allowance. Prompt consideration and allowance are solicited.

The Office is authorized to charge any additional fees under 37 C.F.R. § 1.16, § 1.17, or § 1.136, or credit of any overpayment, to Kenyon & Kenyon Deposit Account No. 11-0600.

Respectfully submitted,

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David J. Zibelli  
Registration No. 36,394

KENYON & KENYON  
1500 K Street, N.W. - Suite 700  
Washington, D.C. 20005 -1257  
Tel: (202) 220-4200  
Fax: (202) 220-4201  
616547